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Attorneys for Defendants Corizon Health, Inc., Joseph
McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan,
Louisa Duru, Molly Johnson, and Courtney Nyman

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RUSSELL PITKIN and MARY PITKIN,
Co-Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,

vs.

CORIZON HEALTH, INC., a Delaware
Corporation; **CORIZON HEALTH, INC.**,
a Tennessee Corporation; **WASHINGTON
COUNTY**, a government body in the State
of Oregon; **JOSEPH MCCARTHY, MD**,
an individual; **COLIN STORZ**, an
individual; **LESLIE ONEIL**, an individual;
CJ BUCHANAN, an individual; **LOUISA
DURU**, an individual; **MOLLY
JOHNSON**, an individual; **COURTNEY
NYMAN**, an individual; **PAT GARRETT**,
in his capacity as Sheriff for Washington
County; **JOHN DOES 1-10**; and, **JANE
DOES 1-10**,

Defendants.

Case No. 3:16-cv-02235-AA

DECLARATION OF J. SCOTT KING

I, J. Scott King, declare as follows:

1. I am the Chief Legal Officer and General Counsel at Corizon Health, Inc. I make this declaration based upon personal knowledge and in support of Defendant's Response to Plaintiff's Motion to Compel.

2. In or about April 2014, Corizon conducted an internal investigation regarding the care and treatment of Madaline Pitkin at Washington County Jail. This investigation was conducted by and at the direction of Corizon's Office of the General Counsel, which is Corizon's legal department.

3. The investigation was directed by Briana Andersen, Esq., who was a Staff Attorney in Corizon's Office of the General Counsel at the time. Other Corizon attorneys, including Katie West, Esq., were also involved in the investigation.

4. One of the primary purposes of this investigation was to assess the situation from a legal perspective, provide legal guidance, and prepare for possible litigation and/or administrative proceedings.


5. Corizon attorneys instructed all persons involved in the investigation that the process was strictly confidential. Specifically, Corizon employees were instructed that they were not to discuss the investigation with any person outside the context of the investigation. Corizon employees were also instructed that all information gathered, notes taken, or documents created as result of this investigation were not to be disclosed outside the investigation.

6. This investigation was conducted pursuant to and accordance with the National Commission on Correctional Health Care's Procedure in the Event of an Inmate Death (J-A-10) and the Corizon Patient Safety Policy and Procedure: Sentinel Event Review Process.

7. Sentinel Event Reviews are sometimes conducted by non-attorneys. Corizon's Office of the General Counsel only directs such investigations when legal advice or assessment is requested by the company.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND I UNDERSTAND THAT THEY ARE MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

Dated this 3rd day of November, 2017.



J. Scott King